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March 19, 2025

**VIA ECF**

The Honorable Harvey Bartel III  
United States District Judge  
Eastern District of Pennsylvania  
16614 U.S. Courthouse, Courtroom 16-A  
601 Market Street  
Philadelphia, PA 19106

**Re:   Atlas Data Privacy Corp. et al v. Innovative Web Solutions, LLC et al.**  
**Case No.: 1:25-cv-01535-HB**  
**GRSM File No.: 1385011**

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Dear Judge Bartel:

This firm represents the interests of Defendant in the above-referenced matter. We write in response to the Court's March 5, 2025 Order (ECF No. 7) to advise the Court that Defendant requests to join the Consolidated Motion to Dismiss and the papers submitted in support thereof, which were filed on June 10, 2024 under ECF No. 27 in the action captioned as *Atlas Data Privacy Corp. et al. v. Lightbox Parent, L.P., et al.*, Case No. 24-04105 (the "Consolidated Motion to Dismiss").

For the reasons set forth in the Consolidated Motion to Dismiss, Defendant respectfully requests that the Court dismiss Plaintiffs' Complaint with prejudice. Consistent with the Court's March 5, 2025 Order, Defendant's joinder in the Consolidated Motion to Dismiss shall not be deemed a waiver of any other grounds for dismissal of the Complaint or any other defenses it may have. Indeed, upon entry of an order similar to the Order entered on the Consolidated Motion to Dismiss, Defendant will join in the consolidated motion to dismiss for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2)<sup>1</sup> and the consolidated motion to dismiss for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6).<sup>2</sup>

Defendant otherwise reserves all rights to raise any other arguments or other defenses that could have been made in a motion to dismiss at a later date.

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<sup>1</sup> See *Atlas Data Privacy Corp. et al. v. GoHunt LLC, et al.*, Case No. 1:24-cv-04380-HB, ECF No. 42.

<sup>2</sup> See *Atlas Data Privacy Corp. et al. v. We Inform, LLC et al.*, Case No. 1:24-cv-04075, ECF No. 59

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We thank the Court for its consideration of this request. Should Your Honor have any questions or require additional information, please do not hesitate to contact the undersigned.

Respectfully Submitted,

GORDON REES SCULLY MANSUKHANI, LLP

*/s/ Clair E. Wischusen*

Clair E. Wischusen, Esq.

CC: All counsel of record via ECF